

1 Gregory H. King, Bar No. 7777
 2 ghk@paynefears.com
 3 Matthew L. Durham, Bar No. 10342
 4 mld@paynefears.com
 5 Chad D. Olsen, Bar No. 12060
 6 cdo@paynefears.com
 7 PAYNE & FEARS LLP
 8 7251 W. Lake Mead Blvd., Suite 525
 9 Las Vegas, Nevada 89128
 10 Telephone: (702) 851-0300
 11 Facsimile: (702) 851-0315

12 Attorneys for GREYSTONE NEVADA, LLC
 13 and U.S. HOME CORPORATION

14 **IN THE UNITED STATES BANKRUPTCY COURT**

15 **DISTRICT OF NEVADA**

16 In re:
 17 GERONIMO PLUMBING, LLC
 18 Debtor.

19 Lead Case: 09-14814-GWZ
 20 Case No. 09-14820-GWZ
 21 Chapter 11

22 **NOTICE OF MOTION FOR RELIEF
 23 FROM AUTOMATIC STAY**

24 Hearing Date: December 8, 2016
 25 Hearing Time: 9:30 a.m.

26 **NOTICE IS HEREBY GIVEN** that a MOTION FOR RELIEF FROM AUTOMATIC
 27 STAY was filed on November 2, 2016 by Greystone Nevada, LLC and U.S. Home Corporation
 28 (collectively “Movants”). Movants seek relief from the bankruptcy stay for the limited purpose of
 1 liquidating their claims against the Debtor (i.e., allowing the district courts to determine liability
 2 and damages) and pursuing the recovery of any available insurance proceeds from the Debtor’s
 3 liability insurers. Movants have no intention of seeking recovery against the Debtor or the
 4 bankruptcy estate and, as such, seeks an order from this Court lifting the automatic stay for this
 5 limited purpose. Any opposition must be filed pursuant to Local Rule 9014(d)(1).

6 **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief
 7 sought in the Motion, or if you want the court to consider your views on the Motion, then you
 8 must file an opposition with the court, and serve a copy on the person making the Motion **no later**
 9 **than 14 days** preceding the hearing date for the motion, unless an exception applies (see Local
 10

1 Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal
2 authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

If you object to the relief requested, you *must* file a WRITTEN response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

NOTICE IS FURTHER GIVEN that the hearing on the said Motion will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South, Third Floor, Las Vegas, Nevada 89101 on December 8, 2016, at the hour of 9:30 a.m.

Dated: November 2, 2016

PAYNE & FEARS LLP

By /s/ Gregory H. King
GREGORY H. KING, Bar No. 7777
MATTHEW L. DURHAM, Bar No. 10342
CHAD D. OLSEN, Bar No. 12060
7251 W. Lake Mead Blvd., Suite 525
Las Vegas, Nevada 89128
Tel. (702) 851-0300

Attorneys for GREYSTONE NEVADA, LLC
and U.S. HOME CORPORATION

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